

Pleadings Index

Date	Document
6/28/22	Plaintiff's Original Petition
6/28/22	Request for Issuance of Service – Worldwide Flight Services, Inc.
6/28/22	Request for Issuance of Service – Realterm US, Inc. d/b/a Aeroterm
7/11/22	Return of Service - Worldwide
7/11/22	Return of Service - Realterm
7/29/22	Defendant Aeroterm US Inc.'s Original Answer

HCDistrictclerk.com

RODRIGUEZ, DEANNA vs. WORLDWIDE FLIGHT
SERVICES INC

8/1/2022

Cause: 202238876 CDI: 7 Court: 270

DOCUMENTS

Number	Document	Post Jdgm	Date	Pgs
103240552	Defendant Aeroterm US Inc.'s Original Answer		07/29/2022	5
102896334	Return of Service		07/11/2022	2
102896339	Return of Service		07/11/2022	2
102708212	Plaintiffs Original Petition		06/28/2022	6
-> 102708213	Request for Issuance of Service		06/28/2022	1
-> 102708214	Request for Issuance of Service		06/28/2022	1

CAUSE NO. _____

DEANNA RODRIGUEZ	§	IN THE DISTRICT COURT OF
<i>Plaintiff,</i>	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
WORLDWIDE FLIGHT SERVICES,	§	
INC. AND REALTERM US, INC.	§	_____ JUDICIAL DISTRICT
<i>Defendants.</i>		

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF THIS COURT:

Plaintiff Deanna Rodriguez (“*Plaintiff*”) files this Original Petition against Defendants Worldwide Flight Services, Inc. and Realterm US, Inc. d/b/a Aeroterm (“*Defendants*”) and would show:

DISCOVERY LEVEL 3

1. Pursuant to the Texas Rules of Civil Procedure, Plaintiff intends to conduct discovery under Discovery Control Plan Level 3 and requests that the Court issue a Level 3 Docket Control Order.

PARTIES

2. Plaintiff is an individual residing in Harris County, Texas. Plaintiff may be served through the undersigned counsel.

3. Defendant Worldwide Flight Services, Inc. is an international corporation subject to this Court’s jurisdiction that may be served through its registered agent, CT Corporation System, at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. Plaintiff requests issuance of citation to Defendant.

4. Defendant Realterm US, Inc. d/b/a Aeroterm is a Maryland corporation subject to this Court's jurisdiction that may be served through its registered agent, CT Corporation System, at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. Plaintiff requests issuance of citation to Defendant.

JURISDICTION & VENUE

5. Jurisdiction is proper in this Court because the amount-in-controversy is within the jurisdictional limits of this Court. Plaintiff seeks monetary relief more than \$250,000 but not more than \$1 million, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney's fees.

6. Venue is proper in this Court because a substantial part of the acts or omissions giving rise to Plaintiff's claims occurred in Harris County.

FACTS

7. On or about August 14, 2020, Plaintiff was a commercial driver for Forward Air Corporation making deliveries to Bush Intercontinental Airport. At the time of the incident, Plaintiff was parked at Defendants' loading terminal located at 19115 Lee Road, Humble, Texas 77338.

8. While Plaintiff was in the unloading process, Defendants' agent, servant, contractor, and/or employee closed the overhead door of the cargo bay on her head.

9. As a result, Plaintiff suffered a serious head injury and serious loss for which she seeks redress.

CAUSES OF ACTION

Negligence, Gross Negligence, and Premises Liability

10. Plaintiff hereby incorporates by reference all paragraphs in this Petition.

11. At all relevant times, Defendants owned and/or retained control over the premises where the Plaintiff was injured.

12. Defendants owed a duty to Plaintiff to conduct its operations in a reasonably safe manner and give adequate warning of any hazardous conditions on the Premises.

13. Defendants breached this duty through their acts and omissions, including, but not limited to, the following:

- a. Negligently closing an overhead door on Plaintiff;
- b. Failing to inspect and make safe any dangerous condition on the premises;
- c. Failing to care for the premises in a reasonable manner;
- d. Failing to properly train its employees in the techniques of unloading delivery vehicles;
- e. Failing to develop and implement proper safety protocols for employees engaged in unloading delivery vehicles;
- f. Failing to enforce any existent precautionary measures and safety protocols;
- g. Failing to supervise the premises, its employees and/or contractors;
- h. Failing to provide safe and effective assistance to Plaintiff;
- i. Failing to warn Plaintiff of a dangerous condition;
- j. Failing to keep a proper lookout;
- k. Disregarding the safety of Plaintiff; and
- l. Other acts deemed by the jury to be negligent.

14. Moreover, Defendants are liable under the doctrine of *respondeat superior* for the acts and omissions of their agents, servants, employees, and statutory employees and agents, including the janitorial staff, security, maintenance staff, or any other staff member in

charge of keeping the premises safe for delivery personnel and other workers. The acts and/or omissions committed by Defendants' agents, servants, and/or employees were performed during the course and scope of their employment with Defendants, which proximately caused the damages pled herein.

15. Each and all of the above and foregoing acts, both of omission and commission, singularly or in combination with others, constituted negligence, which proximately caused the occurrence made the basis of this suit and Plaintiff's injuries.

16. Defendants' conduct as described above constituted gross negligence in that its acts or omissions, when viewed objectively from the standpoint of Defendants at the time of its occurrence, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others; and Defendants had actual, subjective awareness of the risk involved, but nevertheless proceeded with conscious indifference to the rights, safety, and welfare of others, including Plaintiff. Therefore, Plaintiff is entitled to, and seeks, exemplary damages in this action under Sections 41.001 *et seq.* of the Texas Civil Practice and Remedies Code.

DAMAGES

17. Plaintiff's damages include, *inter alia*, injuries to their head, neck, and other parts of her body, which resulted in severe pain, physical impairment, discomfort, mental anguish, distress, and other medical problems. Plaintiff has incurred medical expenses, and is likely to incur future medical expenses, for the treatment of injuries caused by Defendants' negligence. Therefore, Plaintiff brings suit for the following damages:

- a. Past and future medical expenses;
- b. Past and future physical pain and suffering;

- c. Past and future mental anguish;
- d. Past and future physical impairment;
- e. Past and future physical disfigurement; and
- f. Past and future lost wages and lost earning capacity;

DEMAND FOR JURY TRIAL

18. Plaintiff demands a trial by jury on all claims.

PRAYER

Plaintiff prays that Defendants be cited to appear herein and, after a trial on the merits, that the Court enter judgment awarding Plaintiff actual damages and additional damages as allowed by law, exemplary damages, costs of court, pre- and post-judgment interest to the maximum extent as allowed by law, and all such other and further relief, both general and special, at equity and at law, to which Plaintiff may be justly entitled.

Respectfully submitted,

ARMSTRONG & LEE LLP

By: /s/ C.J. Baker

C.J. Baker

State Bar No. 24086719

Jacqueline Stump

State Bar No. 24110954

2800 North Loop West, Ste. 900

Houston, Texas 77092

Telephone: (832) 709-1124

Facsimile: (832) 709-1125

cjbaker@armstronglee.com

jstump@armstronglee.com

service@armstronglee.com

Attorneys for Plaintiff

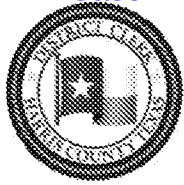
Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Juan Castillo on behalf of C.J. Baker
Bar No. 24086719
jcastillo@armstronglee.com
Envelope ID: 65865536
Status as of 6/29/2022 8:58 AM CST

Associated Case Party: Deanna Rodriguez

Name	BarNumber	Email	TimestampSubmitted	Status
C.J. Baker		cjbaker@armstronglee.com	6/28/2022 6:17:33 PM	SENT
Armstrong & Lee LLP Service		service@armstronglee.com	6/28/2022 6:17:33 PM	SENT
Jacqueline Stump		jstump@armstronglee.com	6/28/2022 6:17:33 PM	SENT

**Marilyn Burgess**

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

Request for Issuance of Service

CASE NUMBER: _____ CURRENT COURT: _____

Name(s) of Documents to be served: Plaintiff's Original Petition

FILE DATE: June 28, 2022 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Worldwide Flight Services, Inc.

Address of Service: 1999 Bryan Street, Suite 900

City, State & Zip: Dallas, TX 75201

Agent (if applicable) CT Corporation System

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias Newspaper _____
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not an E-Issuance) ☐ Attachment
- ☐ Certiorari ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) _____

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP (phone) _____
- ☐ MAIL to attorney at: _____
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- ☒ E-Issuance by District Clerk
(No Service Copy Fees Charged)
- Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.
Visit www.hcdistrictclerk.com for more instructions.*
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____
- ☐ OTHER, explain _____

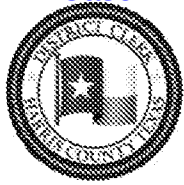
Issuance of Service Requested By: Attorney/Party Name: C.J. Baker

Bar # or ID 24086719

Mailing Address: 2800 N. Loop W., Ste. 900, Houston, TX 77092

Phone Number: 832-709-1124

EXHIBIT 1



Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

6/28/2022 6:17:33 PM
Marilyn Burgess - District Clerk
Harris County
Envelope No: 65865536
By: JACKSON, MONICA J
Filed: 6/28/2022 6:17:33 PM

Request for Issuance of Service

CASE NUMBER: _____ CURRENT COURT: _____

Name(s) of Documents to be served: Plaintiff's Original Petition

FILE DATE: June 28, 2022 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Realterm US, Inc. d/b/a Aeroterm

Address of Service: 1999 Bryan Street, Suite 900

City, State & Zip: Dallas, TX 75201

Agent (if applicable) CT Corporation System

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias Newspaper _____
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not an E-Issuance) ☐ Attachment
- ☐ Certiorari ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) _____

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP (phone) _____
- ☐ MAIL to attorney at: _____
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- ☒ E-Issuance by District Clerk
(No Service Copy Fees Charged)
- Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.
Visit www.hcdistrictclerk.com for more instructions.*
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____
- ☐ OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: C.J. Baker

Bar # or ID 24086719

Mailing Address: 2800 N. Loop W., Ste. 900, Houston, TX 77092

Phone Number: 832-709-1124

EXHIBIT 1

CAUSE NO. 202238876

Marilyn Burgess - District Clerk Harris County

Envelope No. 66192630

By: R PENA

Filed: 7/11/2022 1:33 PM

COPY OF PLEADING PROVIDED BY PLT

RECEIPT NO: 934273 TRACKING NO: 74021638 EML

Plaintiff:
RODRIGUEZ, DEANNA
vs.
Defendant:
WORLDWIDE FLIGHT SERVICES INC

In The 270th
Judicial District Court of
Harris County, Texas
201 CAROLINE
Houston, Texas

CITATION CORPORATE

THE STATE OF TEXAS
County of Harris

To: **WORLDWIDE FLIGHT SERVICES INC (INTERNATIONAL CORPORATION) MAY BE SERVED
THROUGH ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900, DALLAS TX 75201**

Attached is a copy of: PLAINTIFF'S ORIGINAL PETITION

This instrument was filed on June 28, 2022 in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED. You may employ an attorney. If you or your Attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration date of 20 days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at [TexasLawHelp.org](https://www.texaslawhelp.org).

This citation was issued on June 29, 2022, under my hand and seal of said court.

Issued at the request of:

BAKER, CHRISTOPHER JAMES
2800 NORTH LOOP WEST STE 900
HOUSTON, TX 77092
832-709-1124
Bar Number: 24086719



Marilyn Burgess

Marilyn Burgess, District Clerk

Harris County, Texas
201 CAROLINE Houston Texas 77002
(PO Box 4651, Houston, Texas 77210)

Generated By: MONICA JACKSON

CAUSE NO. 2022-38876

DEANNA RODRIGUEZ
PLAINTIFF

VS.

WORLDWIDE FLIGHT SERVICES, INC., ET AL
DEFENDANT

§
§
§
§
§
§
§
§
§
§

IN THE 270th District Court

HARRIS COUNTY, TX

RETURN OF SERVICE

ON Thursday, July 7, 2022 AT 9:51 AM

CITATION, PLAINTIFF'S ORIGINAL PETITION for service on WORLDWIDE FLIGHT SERVICES INC (INTERNATIONAL CORPORATION) C/O REGISTERED AGENT CT CORPORATION SYSTEM came to hand.

ON Friday, July 8, 2022 AT 2:42 PM, I, DON ANDERSON, PERSONALLY DELIVERED THE ABOVE-NAMED DOCUMENTS TO: WORLDWIDE FLIGHT SERVICES INC (INTERNATIONAL CORPORATION) C/O REGISTERED AGENT CT CORPORATION SYSTEM, by delivering to Intake Specialist: George Martinez, 1999 BRYAN STREET, SUITE 900, DALLAS, DALLAS COUNTY, TX 75201

My name is DON ANDERSON. My address is 1900 Brown, BALCH SPRINGS, TX 75180. I am a private process server certified by the Texas Judicial Branch Certification Commission (PSC 4232, expires 8/31/2022). My e-mail address is info@easy-serve.com. My date of birth is 7/14/1956. I am in all ways competent to make this statement, and this statement is based on personal knowledge. I am not a party to this case and have no interest in its outcome. I declare under penalty of perjury that the foregoing is true and correct.

Executed in DALLAS COUNTY, TX on Friday, July 8, 2022.

/S/ DON ANDERSON

Rodriguez, Deanna

Doc ID: 298339_1

EXHIBIT 1

CAUSE NO. 202238876

Marilyn Burgess - District Clerk Harris County

Envelope No. 66192603

By: R PENA

Filed: 7/11/2022 1:32 PM

COPY OF PLEADING PROVIDED BY PLT

RECEIPT NO: 934273 TRACKING NO: 74021639 EML

Plaintiff:
RODRIGUEZ, DEANNA
vs.
Defendant:
WORLDWIDE FLIGHT SERVICES INC

In The 270th
Judicial District Court of
Harris County, Texas
201 CAROLINE
Houston, Texas

CITATION CORPORATE

THE STATE OF TEXAS
County of Harris

To: **REALTERM US INC (DBA AEROTERM) (MARYLAND CORPORATION) MAY BE SERVED
THROUGH ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900, DALLAS TX 75201**

Attached is a copy of: PLAINTIFF'S ORIGINAL PETITION

This instrument was filed on June 28, 2022 in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED. You may employ an attorney. If you or your Attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration date of 20 days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at [TexasLawHelp.org](https://www.texaslawhelp.org).

This citation was issued on June 29, 2022, under my hand and seal of said court.

Issued at the request of:

BAKER, CHRISTOPHER JAMES
2800 NORTH LOOP WEST STE 900
HOUSTON, TX 77092
832-709-1124
Bar Number: 24086719



Marilyn Burgess

Marilyn Burgess, District Clerk

Harris County, Texas
201 CAROLINE Houston Texas 77002
(PO Box 4651, Houston, Texas 77210)

Generated By: MONICA JACKSON

CAUSE NO. 2022-38876

DEANNA RODRIGUEZ
PLAINTIFF

VS.

WORLDWIDE FLIGHT SERVICES, INC., ET AL
DEFENDANT

§
§
§
§
§
§
§
§
§
§

IN THE 270th District Court

HARRIS COUNTY, TX

RETURN OF SERVICE

ON Thursday, July 7, 2022 AT 9:49 AM

CITATION, PLAINTIFF'S ORIGINAL PETITION for service on REAL TERM US INC (DBA AEROTERM) (MARYLAND CORPORATION) C/O REGISTERED AGENT CT CORPORATION SYSTEM came to hand.

ON Friday, July 8, 2022 AT 2:42 PM, I, DON ANDERSON, PERSONALLY DELIVERED THE ABOVE-NAMED DOCUMENTS TO: REAL TERM US INC (DBA AEROTERM) (MARYLAND CORPORATION) C/O REGISTERED AGENT CT CORPORATION SYSTEM, by delivering to Intake Specialist: George Martinez, 1999 BRYAN STREET SUITE 900, DALLAS, DALLAS COUNTY, TX 75201.

My name is DON ANDERSON. My address is 1900 Brown, BALCH SPRINGS, TX 75180. I am a private process server certified by the Texas Judicial Branch Certification Commission (PSC 4232, expires 8/31/2022). My e-mail address is info@easy-serve.com. My date of birth is 7/14/1956. I am in all ways competent to make this statement, and this statement is based on personal knowledge. I am not a party to this case and have no interest in its outcome. I declare under penalty of perjury that the foregoing is true and correct.

Executed in DALLAS COUNTY, TX on Friday, July 8, 2022.

/S/ DON ANDERSON

Rodriguez, Deanna

Doc ID: 298338_1

CAUSE NO. 202238876

DEANNA RODRIGUEZ	§	IN THE DISTRICT COURT
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
WORLDWIDE FLIGHT SERVICES, INC. AND REALTERM US, INC.	§	270th JUDICIAL DISTRICT
	§	

DEFENDANT AEROTERM US, INC.'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Aeroterm US, Inc. (*incorrectly named Realterm US, Inc. dba Aeroterm*) Defendant, in the above entitled and numbered cause, and makes this answer in response to Plaintiff's Original Petition and in support thereof would respectfully show the Court the following:

I.

Defendant asserts a general denial to all of the Plaintiff's claims and causes of action as authorized by Tex. R. Civ. P. 92.

II.

For further answer, Defendant says that the transaction in question and any damages sustained by Plaintiff was the proximate result of Plaintiff's failure to exercise ordinary care and such failure constitutes negligence of at least fifty-one (51%) percent. Under the provisions of the Texas Civil Practice and Remedies Code § 33.001 et seq, Plaintiff is totally barred from recovery, or in the alternative, Plaintiff's recovery, if any, should be diminished in proportion to the percentage of negligence attributable to Plaintiff.

III.

Defendant further pleads that Plaintiff has contributed to her own damages by failure to mitigate her damages, if any. Such failure to mitigate damages is a proximate cause of whatever damages Plaintiff has suffered, if any.

IV.

In the alternative, without waiver of the foregoing, Defendant pleads and requests an instruction that Plaintiff's damages, if any, did not result solely or in any part from any act or omission of this Defendant, rather were the result in whole or in part, of pre-existing illnesses, injuries, conditions or diseases or from subsequent illnesses, injuries, conditions or diseases for which this Defendant cannot be held responsible.

V.

Defendant asserts that a third party, including but not limited to Plaintiff's employer Forward Air Corporation and Co-Defendant World Flight Services, Inc., whom this Defendant cannot control nor be held liable for, is guilty of negligence and a failure to use that degree of care as would have been used by ordinarily reasonable and prudent persons under the same or similar circumstances, and that such negligence proximately caused and/or proximately contributed to cause the matters about which Plaintiff complains in Plaintiff's Original Petition and all amended and/or supplemental petitions.

VI.

Defendant asserts that the conduct complained of by Plaintiff arose from an open and obvious condition, which was in no manner hazardous or a danger to Plaintiff. Defendant did not create this condition, nor did Defendant have actual or constructive knowledge, nor should they have known of this condition as alleged by Plaintiff prior to the alleged accident. As such, Plaintiff's cause of action against this Defendant fails as a matter of law. Defendant further

contends that the complaint of Plaintiff is a negligence claim and not a premises liability claim as pled.

VII.

Defendant further pleads that Plaintiff's claims for lost wages, medical expenses and economic damages are subject to limitations, reductions, and offsets including the recovery of medical or healthcare expenses which are limited to the amount actually paid or incurred. TEX.CIV.PRAC.&REM.CODE §§ 18.091 and 41.015.

VIII.

Defendant asserts that it is entitled to contribution, indemnity, or recovery against all other Defendants named herein by Plaintiff for any sums of money which this Defendant is found liable to Plaintiff pursuant to Chapters 32 and 33 of the TEX.CIV.PRAC. & REM. CODE.

IX.

JURY DEMAND

This Defendant demands a trial by jury pursuant to TEX.R.CIV.P.216.

X.

WHEREFORE, PREMISES CONSIDERED, Defendant, Aeroterm US, Inc. (*incorrectly named Realterm US, Inc. dba Aeroterm*) prays that Plaintiff take nothing by reason of this suit and that Defendant have such other and further relief, at law and in equity, to which it is justly entitled.

Respectfully submitted,

LAW OFFICES OF GABRIEL S. HENDRICKSON



Howard D. Hill
State Bar No: 24007365
2929 Allen Parkway, Suite 1001
Houston, Texas 77019
Tel: 713-831-4800
Fax: 830-542-5616
Email: Howard.Hill@aig.com
ATTORNEY FOR DEFENDANT
AEROTERM US, INC. (incorrectly named
REALTERM US, INC. dba Aeroterm)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has been forwarded on this the 29th day of July, 2022 by:

C.J. Baker
Jacqueline Stump
ARMSTRONG & LEE LLP
2800 North Loop West, Suite 900
Houston, Texas 77092

- ☐ Facsimile: 832-709-1125
- ☒ Efile/Electronic Filing:
cjbaker@armstronglee.com
jstump@armstronglee.com
service@armstronglee.com
- ☐ Hand Delivery
- ☐ Regular Mail
- ☐ Email
- ☐ Certified Mail, Return Receipt Requested



Howard D. Hill

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Sue Land on behalf of Howard Hill

Bar No. 24007365

sue.land@aig.com

Envelope ID: 66813860

Status as of 7/29/2022 4:06 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Armstrong & Lee LLP Service		service@armstronglee.com	7/29/2022 3:22:03 PM	SENT
C.J. Baker		cjbaker@armstronglee.com	7/29/2022 3:22:03 PM	SENT
Jacqueline Stump		jstump@armstronglee.com	7/29/2022 3:22:03 PM	SENT